

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JODI CRANDELL, JUAN ONTIVEROS and
JIM KETTELKAMP, ABRAHAM
LITCHFIELD, and JOSE SUAREZ, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

VOLKSWAGEN GROUP OF AMERICA,
INC. and VOLKSWAGEN
AKTIENGESELLSCHAFT,

Defendants.

Civil Action No.: 18-cv-13377-CCC-MF

ELECTRONICALLY FILED

**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT**

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*Attorneys for Plaintiffs and the
Proposed Settlement Class*

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT on June 21, 2021 or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiffs Jodi Crandell, Juan Ontiveros, Jim Kettelkamp, Abraham Litchfield, and Jose Suarez shall move in the District Court of New Jersey for preliminary approval of class action settlement.

This motion is based on the Memorandum of Law, the accompanying declaration of Plaintiffs' counsel Frederick J. Klorczyk III and the attachments thereto, the pleadings and papers on file herein, and any other written and oral arguments that may be presented to the Court.

Dated: May 27, 2021

Respectfully submitted,

BURSOR & FISHER, P.A.

By: /s/ Frederick J. Klorczyk III
Frederick J. Klorczyk III

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